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13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,

17 No. 15-CR-582 WHO

18 Plaintiff,

19
20 **STIPULATION AND [PROPOSED]**
21 **ORDER TO CONTINUE STATUS**
22 **CONFERENCE**

v.

23 ADAM SHAFI,

24 Defendant.

25 **I. STIPULATION**

26 The parties in this case agree and jointly request the Court to move the status conference
27 scheduled in the above captioned case from June 23, 2016 to September 1, 2016 at 1:30 p.m.
28 The reason for this request is that defense counsel was recently appointed and requires additional
time to review discovery. In addition, defense counsel is travelling from August 8, 2016 to
August 19, 2016, and the Court is unavailable on August 25, 2016.

29 The parties concur that granting the exclusion would allow the reasonable time necessary
30 for effective preparation of counsel and continuity of counsel. *See* 18 U.S.C. §

1 3161(h)(7)(B)(iv). The parties agree that the nature of the prosecution (i.e., terrorism charge
2 involving Foreign Intelligence Surveillance Act information) make the case "complex" under the
3 Speedy Trial Act. See 18 U.S.C. § 3161(h)(7)(B)(ii). The parties also agree that the ends of
4 justice served by granting such an exclusion of time for the purposes of effective preparation of
5 counsel outweigh the best interest of the public and the defendant in a speedy trial. 18 U.S.C. §
6 3161(h)(7)(A).

7 DATED: June 20, 2016

8 _____/s/
9 WAQAR HASIB
10 JEFFREY SHIH
11 Assistant United States Attorneys

12 DATED: June 20, 2016

13 _____/s/
14 GALIA AMRAM
15 Attorney for Defendant Adam Shafi

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17 **[PROPOSED] ORDER**

18 For the reasons stated above the Court hereby CONTINUES the status hearing in the
19 aforementioned case from June 23, 2016 to September 1, 2016 at 1:30 p.m. The Court further
20 finds that the exclusion from the time limits of this period applicable under 18 U.S.C. § 3161 is
21 warranted and that the ends of justice served by the continuance outweigh the best interests of
22 the public and the defendant in a speedy trial. Additionally, the nature of the prosecution makes
23 the case complex such that it is unreasonable to expect adequate preparation for pretrial
24 proceedings or the trial itself within the time limits established in the Speedy Trial Act. 18
25 U.S.C. § (h)(7)(B)(ii). Denying the requested exclusion of time would deprive the defendant
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27

1 effective preparation of counsel, taking into account the exercise of due diligence. 18 U.S.C. §
2 3161(h)(7)(B)(iv).

3 IT IS SO ORDERED.

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5 DATED: _____

6 THE HONORABLE WILLIAM H. ORRICK
7 United States District Judge
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